1 The Honorable Richard A. Jones 2 3 4 5 6 7 IN THE UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 ABDIQAFAR WAGAFE, et al., on behalf of CASE NO. C17-00094RAJ 11 himself and other similarly situated, NOTICE OF MOTION AND **DEFENDANTS' CROSS-MOTION** 12 Plaintiffs, FOR PROTECTIVE ORDER 13 ٧. (Note On Motion Calendar For: DONALD TRUMP, President of the United April 4, 2019) 14 States, et al., 15 Defendants. 16 17 Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Defendants hereby move this 18 Court for an order that discovery not be had with respect to Plaintiffs' request for information 19 concerning why the named Plaintiffs' applications were handled under CARRP, assuming that 20 occurred; and Plaintiffs' Request For Production No. 53, directing Defendants to produce "[t]he 21 Alien Files ("A files") of 100 members of the Naturalization and Adjustment Classes statistically 22 chosen at random." 23 This motion is made and based on the accompanying Memorandum of Points and 24 Authorities, the pleadings, papers and exhibits filed herein, including those filed ex parte and 25 in camera, and such oral argument as the Court may entertain. 26 27 Dated: March 7, 2019.

NOTICE OF MOTION AND DEFENDANTS' CROSS-MOTION FOR PROTECTIVE ORDER - 1 (Case No. C17-00094RAJ)

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